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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FCC-MAIL ROOM

In the matter of:

Amendment of Part 97 of the Commission's)
Rules to provide for temporary operating) PR Docket 93-267
authority)

COMMENTS OF THE RADIO AMATEUR SATELLITE CORPORATION

1. The Radio Amateur Satellite Corporation (AMSAT), founded in 1969, is a not-for-profit organization engaged in the design, construction and operation of satellites in the Amateur Satellite Service and in related educational and scientific activities. AMSAT, together with its affiliated organizations in other countries, has been responsible for 27 such satellites to date, the majority of which are currently operational; numerous additional spacecraft are presently under construction. AMSAT itself has approximately 7,000 dues-paying members.
2. As do many radio amateurs generally, AMSAT supports efforts to attract additional, qualified individuals into amateur radio. Indeed, many new amateur licensees mention a desire to use and become involved with our satellites as being among the reasons why they became radio amateurs in the first place. We were among the earliest and most consistent supporters of no-code licensing for entry-level amateurs in the United States. We share the Commission's concern, as expressed in its Notice of Proposed Rule Making (NPRM) in the present proceeding, that delays in the processing of new license applications may be discouraging some beginners' interest in amateur radio.
3. However, the NPRM's proposed remedy for this problem, the granting of temporary operating authority to unlicensed individuals on the basis of a Certificate of Successful Completion of Examination (CSCE), which individuals would then use self-assigned call signs until their licenses arrive, would seriously damage the Amateur Services by opening a door through which unlicensed persons, who may have failed their examinations or, more likely, may never have had any intention of taking an examination for an amateur license, may operate in the amateur bands using such self-assigned call signs, with no practical means for licensed amateurs to locate them or to determine their legitimacy. We are especially concerned that unscrupulous dealers in amateur-band equipment and other business interests may popularize and exploit such a "loophole," with serious consequences for the Amateur Services themselves.
4. Operation by individuals using self-assigned call signs, which call signs are not registered in any data base, would frustrate any attempts by licensed amateurs to police their bands, and, for that matter, for the Commission in attempting to resolve interference complaints. While it is true that there has always been a certain amount of unlicensed operation in the amateur bands, the call signs of

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such stations generally could be checked against data bases, Callbooks, etc., to determine their legitimacy, which would not be possible under the terms of the NPRM. In any event, the introduction of a Commission-authorized system of self-assigned call signs with "guaranteed anonymity" would, in all likelihood, multiply the problem enormously.

5. AMSAT, in particular, is concerned that such unlicensed and unauthorized operators may interfere with the operation of our satellites, which collectively represent millions of volunteer man-hours of effort by our members and millions of dollars of out-of-pocket investment. The Amateur Satellite Service frequencies employed by our spacecraft uplink and downlink channels are shared with the Amateur Service. By far the most popular satellite uplinks and downlinks today are within the 144-146 MHz, 435-438 MHz and 28.0-29.7 MHz bands. These bands are also among those most likely to be affected by unlicensed operation should the NPRM be adopted.

6. Unauthorized operation by unlicensed U.S. stations may also interfere with the international communications which take place continuously through AMSAT satellites. This has the potential not only of disrupting communications in countries other than our own, but of endangering the good will of foreign governments, including their satellite launch agencies, which we have carefully cultivated for 25 years and upon which we depend for our future operations. As a result of NASA's reliance on the Space Shuttle for most of its own launch activities, every AMSAT satellite since 1978 has been launched by foreign agencies, at far lower cost to us than could have been possible using the Space Shuttle.

7. We urge the Commission to reject the plan for "instant licensing" and self-assigned call signs contained in the NPRM. As an alternative, we respectfully suggest that the Commission explore the electronic filing and processing of amateur license applications as authorized in PL 102-538 and as proposed by the American Radio Relay League.

Respectfully submitted,

RADIO AMATEUR SATELLITE CORPORATION

A handwritten signature in cursive script, reading "William A. Tynan".

by William A. Tynan, W3XO, President

January 4, 1994